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Attorneys for Defendant METAQUOTES SOFTWARE CORP

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

	)	CASE No. SACV12 – 1448 AG
WILLIAM WILBER et al.,	)	(JPRX)
	)	
Plaintiffs,	)	<b>DISCOVERY STIPULATION</b>
v.	)	
	)	
TOP GLOBAL CAPITAL, INC., et al.	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

**Plaintiffs William Wilbur, Nicole Kharzi, Karen Oldmixon, Larry Cain,  
Robyn Jamison, Otto Fox, Gail Young, Mark Thomas, Cindy Dicosmio, Carol  
Winkler, and David Winkler (collectively “PLAINTIFFS”) and Defendant**

1 **Metaquotes Software Corp (“MSC”) hereby agree by their respective counsel**  
2 **to the following terms for a stipulation regarding discovery in the above case.**  
3

4 1. PLAINTIFFS and MSC agree that discovery in this proceeding will be as  
5 described in the Federal Rules of Civil Procedure (“FRCP”) 33, 34, and 36  
6 unless otherwise set forth within this stipulation.  
7

8  
9 2. PLAINTIFFS and MSC agree that the procedure for Interrogatories to  
10 Parties will be dictated by FRCP 33 unless otherwise indicated below:  
11

12  
13 a. Parties agree that answers to each parties’ Set 1 of interrogatories will  
14 be mutually exchanged on March 1, 2015.  
15

16  
17 b. Parties agree that any subsequent sets of interrogatories that will be  
18 served will have an additional 10 days from the designated 30 days to  
19 respond as dictated by FRCP 33.  
20

21  
22 c. Parties agree to extend the limit of 25 interrogatories per party to 35  
23 interrogatories per party.  
24

25  
26 d. Parties agree that due to the number of plaintiffs involved in this  
27 action, each interrogatory propounded in a single set of interrogatories  
28 will be answered as it pertains to each individual PLAINTIFF. Thus,

1 each interrogatory shall be answered eleven (11) times each as it  
2 pertains to individual PLAINTIFF.  
3

4 e. Parties agree that any subpart of an interrogatory will not be deemed  
5 as a separate interrogatory due to the number of plaintiffs and  
6 defendants in this case.  
7  
8

9  
10 3. PLAINTIFFS and MSC agree that the procedure for Requests for Production  
11 of Documents will be dictated by FRCP 34 unless otherwise indicated  
12 below:  
13

14  
15 a. Parties agree that answers to each parties' Set 1 of Request for  
16 Production of Documents will be mutually exchanged on March 1,  
17 2015.  
18

19  
20 b. Parties agree that any subsequent sets of requests for production of  
21 documents that will be served will have an additional 10 days from  
22 the designated 30 days to respond as dictated by FRCP 34.  
23

24  
25 4. PLAINTIFFS and MSC agree that the procedure for Requests for  
26 Admissions will be dictated by FRCP 36 unless otherwise indicated below:  
27  
28

1 a. Parties agree that if any initial set of request for admissions is served  
2 on either party by January 30, 2015, the response will be due on  
3 March 1, 2015.  
4

5  
6 b. Parties agree that any sets of requests of admissions that will be  
7 served after January 30, 2015 will have an additional 10 days from  
8 the designated 30 days to respond as dictated by FRCP 34.  
9

10  
11 5. PLAINTIFFS and MSC reserve the right to further agree to modify this  
12 stipulation and other FRCP rules regarding discovery in writing through out  
13 the course of this action for the benefit of effective and efficient discovery.  
14  
15

16  
17  
18 Date: January 20, 2015

PHILLIPS LYTTLE LLP

19  
20 \_\_\_\_\_  
/s/

21 ROBERT V. CORNISH JR.  
22 Attorney for Plaintiffs

23 Date: January 21, 2015

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24  
25 \_\_\_\_\_  
/s/

26 MARTIN F. TRIANO, ESQ.  
27 Attorney for Defendant  
28 METAQUOTES SOFTWARE CORP.

Upon review of the discovery stipulation filed by PLAINTIFFS and MSC on January 28, 2015, this Court hereby grants this Order approving the parties' Discovery Stipulation.

Date: February 3, 2015

per Brennkraft

JEAN P. ROSENBLUTH  
Magistrate Judge